

Guy Ruttenberg, Bar No. 207937  
[guy@ruttenbergiplaw.com](mailto:guy@ruttenbergiplaw.com)  
Michael Eshaghian, Bar No. 300869  
[mike@ruttenbergiplaw.com](mailto:mike@ruttenbergiplaw.com)  
RUTTENBERG IP LAW,  
A PROFESSIONAL CORPORATION  
1801 Century Park East, Suite 1920  
Los Angeles, CA 90067  
Telephone: (310) 627-2270  
Facsimile: (310) 627-2260

*Attorneys for Defendant IGN Entertainment, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PERSONAL RECORDS, LLC, *a South  
Dakota limited liability company*; and  
CALVIN PAUL JONES, *an individual*,

Plaintiffs,

v.

IGN ENTERTAINMENT, INC., *a Delaware  
corporation*,

Defendant.

Case No. 4:20-cv-03133-JSW

**SECOND STIPULATION TO ENLARGE  
TIME TO RESPOND TO COMPLAINT**

Judge: Hon. Jeffrey S. White

Pursuant to Civil Local Rule 6-1(a), Defendant IGN Entertainment, Inc. and Plaintiffs Personal Records, LLC and Calvin Paul Jones, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs filed this action on May 7, 2020;

WHEREAS, Defendant was served with the Complaint on May 12, 2020;

WHEREAS, Defendant's original date by which to answer or otherwise plead in response to the Complaint was June 2, 2020;

WHEREAS, on June 2, 2020, the parties agreed to a 30-day extension for Defendant to answer or otherwise respond to the Complaint, making Defendant's current response due by July 2, 2020 (Dkt. No. 8);

WHEREAS, the parties have met and conferred and agreed that good cause exists for a further 30-day extension for Defendant to answer or otherwise respond to the Complaint, as set forth below;

WHEREAS, Defendant's counsel wrote a letter on May 19, 2020 to Plaintiffs' counsel explaining, among other issues, that Defendant believes that (i) it is the wrong defendant in this action, (ii) the statute of limitations has expired, (iii) Plaintiffs' unjust enrichment claim is preempted, and (iv) Plaintiffs lack standing to assert the claims asserted in the operative Complaint (*see* Ex. A);

WHEREAS, the parties met and conferred on May 28, 2020 regarding the abovementioned issues;

WHEREAS, Plaintiffs requested time to gather information in response to Defendant's inquiries;

WHEREAS, the parties have thus agreed to a further 30-day extension for Defendant to respond to Plaintiffs' Complaint so that Defendant can avoid unnecessary expenditures before obtaining Plaintiffs' responses;

WHEREAS, an additional 30 days for Defendant's answer or response to the Complaint will not alter the date of any event or deadline already fixed by Court order; and

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,  
2 through their respective counsel, that Defendant shall answer or otherwise respond to Plaintiffs'  
3 Complaint by August 3, 2020.

4 The parties hereby reserve all right and defenses.

5  
6  
7 DATED: June 15, 2020

By: /s/ Guy Ruttenberg

8 Guy Ruttenberg  
9 [guy@ruttenbergiplaw.com](mailto:guy@ruttenbergiplaw.com)  
10 Michael Eshaghian  
11 [mike@ruttenbergiplaw.com](mailto:mike@ruttenbergiplaw.com)  
12 RUTTENBERG IP LAW, A PROFESSIONAL  
13 CORPORATION  
14 1801 Century Park East, Suite 1920  
15 Los Angeles, CA 90067  
16 Telephone: (310) 627-2270  
17 Facsimile: (310) 627-2260  
18 *Attorneys for Defendant*

19  
20 DATED: June 15, 2020

By: /s/ William R. Mitchell

21 William R. Mitchell  
22 [bill@wrmbizlaw.com](mailto:bill@wrmbizlaw.com)  
23 WILLIAM R. MITCHELL, INC.  
24 101 Pacifica, Suite 155  
25 Irvine, CA 92618  
26 Telephone: (949) 679-6920  
27 Facsimile: (949) 398-7300  
28 *Attorneys for Plaintiffs*

21 I, Guy Ruttenberg, hereby certify that the content of this document is acceptable to all  
22 persons required to sign this document and that I obtained the authorizations necessary for the  
23 electronic signatures of all parties for this document.

24  
25 /s/ Guy Ruttenberg  
26 Guy Ruttenberg  
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